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Attorneys for Defendants  
ZIMMER, INC., ZIMMER HOLDINGS, INC.,  
and ZIMMER SURGICAL, INC., f/k/a ZIMMER  
ORTHOPAEDIC SURGICAL PRODUCTS, INC.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LENORA DIGIACOMO,

CASE NO. 2:12-cv-01019-RCJ-PAL

Plaintiff,

VS.

ZIMMER, INC., ZIMMER HOLDINGS,  
INC., ZIMMER ORTHOPAEDIC  
SURGICAL PRODUCTS, INC.,

#### Defendants.

**AGREED MOTION FOR  
EXTENSION OF TIME TO ANSWER  
OR OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

The defendants, Zimmer, Inc., Zimmer Holdings, Inc., and Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc. (collectively, “Zimmer Defendants”), respectfully move for a 30-day extension of time, to and including September 13, 2012, within which to file and serve their answers or other responses to plaintiff’s Complaint. In support of this agreed motion, the Zimmer Defendants state as follows:

1. The plaintiff, Lenora Digiacomo (“Plaintiff”) commenced this action in this Court on June 15, 2012.

2. Zimmer Defendants' answers or other responses to the Complaint are currently due on or before August 14, 2012, and that deadline has not yet expired.

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3. Zimmer Defendants and their counsel seek this initial enlargement of time to allow this Court time to rule on the parties' Joint Motion to Stay Pending Transfer to Multidistrict Proceedings, filed on August 14, 2012.

4. Zimmer Defendants have not filed any prior motions to extend their time to answer or otherwise respond.

5. The undersigned counsel conferred with Plaintiff's counsel prior to filing this motion. Plaintiff's counsel agreed to the 30-day extension of time sought. Thus, by the parties' agreement, Zimmer Defendants would file their responsive pleadings on or before September 13, 2012.

WHEREFORE, Zimmer, Inc., Zimmer Holdings, Inc., and Zimmer Surgical, Inc., f/k/a Zimmer Orthopaedic Surgical Products, Inc., respectfully request that the Court grant their Agreed Motion For Extension Of Time To Answer Or Otherwise Respond To Plaintiff's Complaint.

DATED this 14th day of August, 2012.

SNELL & WILMER L.L.P.

By: /s/ Jay J. Schuttert  
Jay J. Schuttert  
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Attorneys for Defendants  
ZIMMER, INC., ZIMMER HOLDINGS, INC.,  
and ZIMMER SURGICAL, INC., f/k/a ZIMMER  
ORTHOPAEDIC SURGICAL PRODUCTS, INC.

IT IS SO ORDERED this 17th day  
of August, 2012.

Peggy A. Leen  
Peggy A. Leen  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT** by electronic service (via Case Management/Electronic Case Filing) to the following:

Joshua L. Benson, Esq.  
**MARQUIS & AURBACH**  
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Attorneys for Plaintiff

DATED this 17 day of August, 2012.

Long C. Stephenson  
An Employee of Snell & Wilmer L.L.P.